

3574D/mw

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NATALY MENDOZA, Special Administrator )		
Of the Estate of MARTHA RABADAN, )		
MARIA MENDOZA and IGNACIO CASTRO, )		
Decedents, )		
	)	
Plaintiffs, )		
	)	
vs. )		No. 1:19-cv-3952
	)	
JUJHAR SINGH, BSB TRANSPORT, INC., )		Honorable Charles R. Norgle
and RELIABLE TRANSPORTATION )		
SOLUTIONS, LLC., )		
	)	
Defendants. )		

**MOTION FOR COURT ORDER**

Now come defendants, BSB TRANSPORT, INC. and JUJHAR SINGH, by and through their attorneys, CAMELI & HOAG, P.C., and moves the court for a final court order resolving the pending motion to dismiss for lack of jurisdiction. In support thereof, defendants state as follows:

1. By court order, plaintiff was required to file response brief to defendants' motion to dismiss on or before January 10, 2020 (Docket No. 45).
2. Instead of filing a response brief to defendants' motion to dismiss, plaintiff agreed that the matter should simply be transferred to the Eastern District of Missouri. (Exhibit A email chain with attorney Flaherty.)
3. Defense counsel submitted a proposed agreed order to plaintiff's attorney. A copy of the order is attached to this motion as Exhibit B.

4. Plaintiff's attorney does not agree with a dismissal of the case in the Northern District of Illinois, but instead wants a court order transferring the matter to the Eastern District of Missouri without dismissal. However, he has presented no defense to the motion to dismiss.

5. The relief sought in defendant's motion to dismiss is a *dismissal* of the pending case in the Northern District of Illinois. The defendant's proposed court order comports with the relief sought in the motion

WHEREFORE, for the above reasons, defendant prays that the court enter an order dismissing plaintiff's complaint in the Northern District of Illinois without prejudice

Dated: January 23, 2020

Respectfully submitted,

CAMELI & HOAG, P.C.

/s/ Perry W. Hoag  
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*Attorneys for Defendants Jujhar Singh  
and BSB Transport, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 23, 2020, he filed the foregoing document via this Court's CM/ECF system, which will provide service on all parties of record.

/s/ Perry W. Hoag